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11
12 IN THE UNITED STATES DISTRICT COURT
13
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

17 UNITED STATES,

18 Plaintiff,

19 v.

20 BABAK BROUMAND AND
MALAMATENIA MAVROMATIS,

21 Defendants.

Case No. CR-21-00162-WHO

**STIPULATION TO CONTINUE
STATUS CONFERENCE/CHANGE OF
PLEA FROM OCTOBER 23, 2025 AT
1:30 P.M. TO DECEMBER 11, 2025,
AT 1:30 P.M. AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT;
AND [PROPOSED] ORDER**

24
25 STIPULATION

26 The parties hereby stipulate that the currently set status conference/change of plea be
27 continued from October 23, 2025, at 1:30 p.m. to December 11, 2025, at 1:30 p.m.
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STIPULATION AND [PROPOSED] ORDER
United States v. Broumand, et al;
Case No. CR-21-00162-WHO

1 1. Defendant BABAK BROUMAND is in custody of the Bureau of Prisons in
2 Alabama after being convicted at jury trial in the related case of *United States v. Broumand*, 20-
3 224-RGK(A).

4 2. The government has produced over 60,000 pages of discovery to defendant
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,
6 mortgage broker, title company, and escrow company records, tax returns, and witness
7 interview reports.

8 3. On March 24, 2022, the government obtained a superseding indictment in this
9 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in
10 which she was charged with two counts of False Statements on a Loan Application in
11 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's
12 indictment, co-defendant BABAK BROUMAND had already been charged.

13 4. The parties have reached an agreement on a proposed resolution for both
14 defendant Broumand and defendant Mavromatis. The government has filed the plea
15 agreement for defendant Broumand. (Dkt. 61.) The government will be recommending
16 diversion for defendant Mavromatis; Pretrial services has conducted an evaluation and
17 concurs in the recommendation of diversion.

18 5. On October 21, 2025, defendant Mavromatis signed a diversion agreement with
19 the government, pursuant to a yet unfiled charging document—a First Superseding
20 Information. On October 1, 2025, the federal government underwent a lapse in funding (the
21 “Government Shutdown”). The assigned Special Assistant United States Attorneys, who are
22 principally assigned to the Central District of California, are required to travel in order to
23 appear on behalf of the government in this case. Given the Government Shutdown,
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1 government funded travel is currently restricted. Further, defense counsel for defendant
 2 Mavromatis needs additional time to review and discuss the yet unfiled First Superseding
 3 Information with his client. Additionally, counsel and the government require additional
 4 time to schedule arraignment of Ms. Mavromatis on the First Superseding Information.
 5 Accordingly, in addition to the reasons outline below, the government and defense counsel
 6 agree that time is excludable because of the Court's "consideration...of [the] proposed plea
 7 agreement to be entered into by the [parties]." 18 U.S.C. § 3161(h)(1)(G).

9 6. Therefore, the parties stipulate and agree that excluding time until December 11,
 10 2025, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).
 11 The parties further stipulate and agree that the ends of justice served by excluding the time
 12 from October 23, 2025, through December 11, 2025, from computation under the Speedy Trial
 13 Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
 14 3161(h)(7)(A), (B)(iv).

16 7. Accordingly, the parties ask that the Court to continue the status conference/change
 17 of plea to December 11, 2025, since that is the date the parties are soonest available that
 18 provides sufficient time for the First Superseding Information to be filed, government travel to
 19 be arranged, and the arraignment to held, as referenced above.

21 9. The undersigned Special Assistant United States Attorneys certify that they have
 22 obtained approval from all counsel to file this stipulation and proposed order.

24 IT IS SO STIPULATED.

26 DATED: October 21, 2025

/s/ Juan M. Rodriguez
 27 MICHAEL J. MORSE
 28 JUAN M. RODRIGUEZ
 Special Assistant United States Attorney

STIPULATION AND [PROPOSED] ORDER
United States v. Broumand, et al;
 Case No. CR-21-00162-WHO

1
2 DATED: October 20, 2025

/s/ Steven F. Gruel
3 STEVEN F. GRUEL
4 Counsel for Defendant BROUMAND

5 DATED: October 20, 2025

/s/ Paul H. Nathan
6 PAUL H. NATHAN
7 Counsel for Defendant MAVROMATIS

8 [PROPOSED] ORDER

9 Based upon the facts set forth in the stipulation of the parties and for good cause shown,
10 the Court hereby continues the status conference from October 23 2025, at 1:30 p.m. to
11 December 11, 2025, at 1:30 p.m.

12 Furthermore, the Court finds that failing to exclude the time from October 23, 2025
13 through December 11, 2025, would unreasonably deny defense counsel and the defendant the
14 reasonable time necessary for effective preparation, taking into account the exercise of due
15 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

16 The Court further finds that the ends of justice served by excluding the time from
17 October 23, 2025, through December 11, 2025, from computation under the Speedy Trial Act
18 outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and
19 with the consent of the parties.

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1 IT IS HEREBY ORDERED that the time from October 23, 2025, to December 11,
2 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§
3 3161(h)(1)(G), (h)(7)(A), (B)(iv).
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6 IT IS SO ORDERED.
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DATED:

HONORABLE WILLIAM H. ORRICK
United States District Court